

**From:** Elizabeth A Javinsky  
**Sent:** Wednesday, March 30, 2005 12:48 PM  
**To:** NIEHS NICEATM  
**Subject:** Comments on Alternatives to the Draize Testing

To William Stokes, D.V.M.:

Just wanted to send some comments about proposals out there to using some alternatives to the Draize eye irritancy test. I have long been bothered by the repeated use of this test in animal's eyes given the amount of pain and damage it can cause to these animals. It also seems that this test is repeated over and over again unnecessarily. Therefore, I was happy to read that some alternatives to this test are being considered such as using eyes from animals killed for other purposes (although I dislike the idea of animals being killed for many of the reasons out there that seem to justify killing them; but if they are going to be killed, it seems to be logical to use all parts of the animals rather than causing other, additional animals pain and suffering) and also using the membrane from a chicken embryo.

From what I have read about these tests, they are valid alternatives to using the Draize test on live animals. Although I would like to see the use of the Draize test completely abolished, I see these alternatives as at least a first step towards more humane treatment of animals.

Given all I have said above, I strongly urge and support you in:

1. Recommending that federal agencies immediately begin accepting the alternative methods found to be useful.
2. Move forward with recommended improvements in the alternatives without delaying the acceptance of the tests' current forms
3. And most importantly, to go beyond the current efforts by developing and validating nonanimal methods to completely replace the use of the Draize test.

Thank you so much for taking my opinions into consideration and supporting the above recommendations for the sake of those who do not

have their own voice.

Sincerely,

Elizabeth Javinsky MA, LP